

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-CR-10112-RGS
)	
KARL THOMPSON)	
Defendant.)	
)	

GOVERNMENT'S OPPOSITION TO DEFENDANT'S
MOTION FOR REVOCATION OF DETENTION ORDER

Now comes the United States, by its attorneys, Michael J. Sullivan, United States Attorney, and David G. Tobin, Assistant U.S. Attorney, and hereby moves this Honorable Court to deny the defendant's Motion for Revocation of Detention Order. In support of this opposition, the United States avers that the defendant is a flight risk and his release to a substance abuse treatment facility would constitute a threat to the safety of others. The United States relies upon the findings of Chief Magistrate Judge Bowler in support of its opposition to the defendant's motion. The defendant participated in a cocaine base sale with a juvenile. The sale occurred in a residential neighborhood within close proximity to a playground. The facts of the case, and the defendant's criminal record, which includes three previous drug

cases, make him an unsuitable candidate for release.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

Dated: February 9, 2004